

REMARKS

Claims 1-20 are pending in the application and the same are rejected. Claims 1-20 remain in the application and are presented for further review and consideration by the Examiner.

The Examiner has rejected claims 1, 3-6, 8, 10-15 and 17-19 under 35 U.S.C. §102(b) as being anticipated by Dufour, U.S. Patent No. 5,613,205. (Examiner's Action, page 3, ¶ 2).

Applicant respectfully disagrees.

Dufour discloses measuring signal strength and propagation delay between the serving base station 21 and the base station 22, 23 of each handoff cell. These measurements are used to calculate the distance between the mobile terminal 24 and each base station 21, 22, 23. The calculated distances are then used, along with the known locations of the base stations 21, 22, 23, to calculate the location of the mobile terminal 24.

While it is clear that Dufour discloses the base stations 21, 22, 23 having coverage areas 26, 29, 30, Dufour does not disclose discovering the locations of the coverage areas 26, 29, 30. Nor does Dufour even disclose knowing the locations of the coverage areas, 26, 29, 30. Merely illustrating circles in Figure 2 indicating coverage areas 26, 29, 30 is not a disclosure that the locations of coverage areas 26, 29, 30 are known.

Additionally, merely measuring the signal strength and propagation delay between the base stations 21, 22, 23 and the mobile terminal 24 is not a disclosure of discovering locations of the coverage areas 26, 29, 30. These measurements only allow calculation of the distance from each base station 21, 22, 23 to the mobile terminal 24, which may be used to calculate the location of the mobile terminal 24. Clearly, neither the distance from the base stations 21, 22, 23 to the mobile terminal 24 nor the location of the mobile terminal 24 is the location of the coverage areas 26, 29, 30. Neither is the location of the base stations 21, 22, 23 the location of the coverage areas 26, 29, 30.

Furthermore, although handing off the mobile terminal 24 between base stations 21, 22, 23 may occur near the boundaries of the coverage areas 26, 29, 30, it is not disclosed in Dufour, or even necessary, that the locations of the coverage areas 26, 29, 30 be discovered to accomplish a hand off.

In contrast, Applicant's independent claims 1, 8, and 15 include wording that for each node wirelessly communicating with the object device, a location of a coverage area is discovered for the node. Dufour does not disclose this limitation.

In addition, since Dufour does not disclose discovering locations of coverage areas 26, 29, 30, or even knowing the locations of the coverage areas 26, 29, 30, Dufour also does not disclose discovering an area of location for the mobile terminal 24 from the location of the coverage areas 26, 29, 30. Instead, Dufour clearly and explicitly discloses discovering the location of the mobile terminal 24 from the locations of the base stations 21, 22, 23 and the distances from the base stations 21, 22, 23 to the mobile terminal 24, not from locations of the coverage areas 26, 29, 30.

In contrast, Applicant's independent claims 1, 8, and 15 include wording that an area of location for the object device is discovered from the location of the coverage area for each node wirelessly communicating with the object device. Dufour does not disclose this limitation.

The Examiner has rejected claims 2, 9, and 16 under 35 U.S.C. §103(a) as being unpatentable over Dufour in view of Yahagi, U.S. Patent No. 5,613,199. (Examiner's Action, page 4, ¶ 3).

Applicant respectfully disagrees.

The Examiner has rejected claims 7, 14 and 20 under 35 U.S.C. §103(a) as being unpatentable over Dufour. (Examiner's Action, page 5, ¶ 4).

Applicant respectfully disagrees.

In view of Applicant's arguments with respect to independent claims 1, 8, and 15 being allowable, Applicant respectfully submits that the remaining dependent claims are also allowable because they contain all of the limitations of their respective independent claims and further add structural and functional limitations.

The foregoing amendments and arguments are believed to be a complete response to the most recent Examiner's Action.

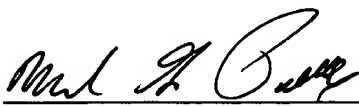
No new matter has been added.

It is respectfully submitted that there is no claim, teaching, motivation, or suggestion in any of the cited art, alone or in combination, to produce what Applicant claims.

It is further submitted that the application, as amended, defines patentable subject matter and that the claims are in a condition for allowance. Such allowance at an early date is respectfully requested.

Should any issues remain which would preclude the prompt disposition of this case, it is requested that the Examiner contact the undersigned practitioner by telephone.

Respectfully submitted,
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